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*Attorneys for Defendants Grand Management
Services, Jerry Mascolo, Leondra Coleman, and
Dawn Cockrum*

The Honorable Michael Simon

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PATSY JAY,

Plaintiff,

v.

**GRAND MANAGEMENT SERVICES,
INC., EVERGREEN GARDENS LIMITED
PARTNERSHIP, JERRY MASCOLO,
LEONDRA COLEMAN, and DAWN
COCKRUM,**

Defendants.

Case No. 3:23-cv-656-SI

DECLARATION OF HEIDI L. MANDT IN
SUPPORT OF GRAND MANAGEMENT
SERVICES AND JERRY MASCOLO,
LEONDRA COLEMAN, AND DAWN
COCKRUM'S MOTION FOR SUMMARY
JUDGMENT

I, HEIDI L. MANDT, do hereby declare and state:

1. I represent defendants Grand Management Services, Inc., Jerry Mascolo, Leondra Coleman, and Dawn Cockrum in the above-referenced matter. I make this declaration based upon my own personal knowledge and am competent to testify as to the matters stated herein.

2. Attached hereto as **Exhibit A** are true and correct copies of excerpt pages from the deposition transcript of Kristin Smith taken on July 18, 2024, at the request of Plaintiff's counsel.

3. Attached hereto as **Exhibit B** are true and correct copies of excerpt pages from the deposition transcript of Leondra Coleman taken on July 19, 2024, at the request of Plaintiff's counsel.

4. Attached hereto as **Exhibit C** are true and correct copies of excerpt pages from the deposition transcript of Dawn Cockrum taken on July 29, 2024, at the request of Plaintiff's counsel.

5. Attached hereto as **Exhibit D** are true and correct copies of excerpt pages from the deposition transcript of Jerry Mascolo taken on July 29, 2024, at the request of Plaintiff's counsel.

6. Attached hereto as **Exhibit E** are true and correct copies of excerpt pages from the deposition transcript of Patsy Jay taken on August 16, 2024, at the request of the defendants.

7. Attached hereto as **Exhibit F** is a true and correct copy of plaintiff's formal written complaint to Grand Management dated July 15, 2021.

8. Attached hereto as **Exhibit G** is a true and correct copy of the July 16, 2024, *Restraining Order to Prevent Abuse* against non-party John McKnight obtained by Plaintiff and issue by the Tillamook County Circuit Court.

9. Attached hereto as **Exhibit H** is a true and correct copy of the booking card, Pre-Booking Sheet and probable cause statement associated with the arrest of non-party John

McKnight on August 31, 2021, for violating the terms of the Restraining Order obtained by Plaintiff (Exhibit G).

10. Attached hereto as **Exhibit I** is a true and correct copy of Grand Management's Notice of Intent to Evict dated August 20, 2021.

11. Attached hereto as **Exhibit J** is a true and correct copy of Plaintiff's handwritten letter to objecting to the August 20, 2021, Notice of Intent to Evict dated August 25, 2021. The request for accommodation for Plaintiff to use her walker on the porch of her apartment is highlighted on Page 8 of Exhibit J.

12. Attached hereto as **Exhibit K** is a true and correct copy of Section 10 from Plaintiff's 2021 lease agreement, signed by Plaintiff on April 9, 2021, and entitled Property Ground Rules. The relevant portion of the agreement is highlighted on page 3 of Exhibit K.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE, ARE BASED ON MY OWN PERSONAL KNOWLEDGE. I UNDERSTAND THAT THIS DECLARATION CAN BE USED AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 12th day of November, 2024.

WILLIAMS KASTNER

By: /s/ Heidi L. Mandt

Heidi L. Mandt, OSB #953459

CERTIFICATE OF SERVICE

I certify that I served the foregoing DECLARATION OF HEIDI L. MANDT IN SUPPORT OF GRAND MANAGEMENT SERVICES AND JERRY MASCOLO, LEONDRA COLEMAN, AND DAWN COCKRUM'S MOTION FOR SUMMARY JUDGMENT via the court's ECF service on the parties below on this 12th day of November, 2024:

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